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March 24, 2025

VIA ECF

The Honorable Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 21A
New York, NY 10007-1312

Re: McCrary v. Sean Combs, et al., 24-CV-08054

Dear Judge Vyskocil:

I write in response to Your Honor's Order Denying Motions to Appear Pro Hac Vice and To Withdraw ("Order") (Dkt. #76). In the Order, Your Honor states that "Mr. Buzbee improperly filed and litigated this case using the ECF credentials of local counsel, whose apparent complicity in his improper conduct may be grounds for sanctions."

Respectfully, that description is simply not true. Moreover, I cannot, by my silence, allow it to appear true. I am co-counsel with The Buzbee Law Firm in this and numerous other cases relating to Sean Combs, both in federal and state court. The Buzbee Law Firm selected me to be co-counsel because I am a former prosecutor who has extensive experience representing victims of sexual assault. Mr. Buzbee did not file or litigate this case with my ECF credentials (nor would I let him or anyone else do so). I reviewed all documents in this case and filed them under my ECF because I approved them. I have been working alongside The Buzbee Law Firm to bring justice to our clients affected by Mr. Combs.

It is true that Mr. Buzbee signed the complaint and several other documents as my co-counsel. At the time, I did not view that as problematic nor did I view that as the entering of a formal appearance and we apologize to the Court for any misunderstanding regarding same and will be guided accordingly in future filings. We thank the Court for its time and attention in this matter.

Respectfully,
Antigone Curis

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